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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In re	)	
	)	
Amendment of Section 73.202(b)	)	
of the Commission's Rules	)	MM Docket
Table of Allotments,	)	
FM Broadcast Stations	)	RM -
Council Grove, Kansas	)	

To: Chief, Policy and Rules Division

PETITION FOR RULEMAKING

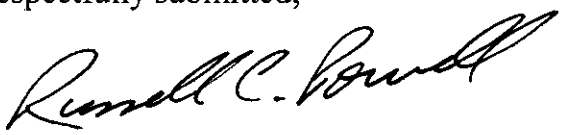
Great Plains Christian Radio, Inc. ("Great Plains"), hereby submits its petition for an amendment of Section 73.202(b) of the Commission's Rules that would reserve FM Channel 281C3 at Council Grove, Kansas for noncommercial use.

Attached to this petition and incorporated by reference herein are the engineering statement and exhibits prepared by Larry Waggoner, consulting engineer for Great Plains, which demonstrate that the referenced FM channel meets the two distinct criteria set forth in the Second Report and Order in Reexamination of of the Comparative Standards for Noncommercial Educational Applicants, MM Docket 95-31, 18 FCC Rcd 6691 (paragraphs 34 through 40) (2003) ("NCE Second Report and Order"), pursuant to the instructions set forth in the Public Notice released by the Media Bureau on September 30, 2003, DA 03-2990. The complete technical preclusion showing required by the NCE Second Report and Order and the September 30, 2003 Public Notice is also attached.

The reservation of Channel 281C3 will serve the public interest by assuring needed noncommercial educational radio service to the community of Council Grove, Kansas and the surrounding listening area.

Great Plains is a noncommercial educational organization, and is the licensee of several operating full-service and translator FM radio stations. If the reservation requested herein is ordered by the Commission, Great Plains will file an application for a construction permit to build and, later, an application for a license to operate, a noncommercial FM station on this channel.

Respectfully submitted,



Russell C. Powell
Attorney for Great Plains Christian Radio, Inc.

Taylor & Powell, LLC
908 King Street, Suite 300
Alexandria, VA 22314
(703)836-9405

November 19, 2003

COUNCIL GROVE, KANSAS

Channel #281C3

Non-Commercial Allocation Study

November 14, 2003

LARRY P. WAGGONER
Broadcast Technical Consultant
1712 VALLEYVIEW CT. • WICHITA, KS 67212 • (316) 722-3726

Council Grove, Kansas Channel #281C3
Non-Commercial Allocation Study

This Non-Commercial Allocation Study will analyze the commercial FM allocation for channel #281C3 in Council Grove, Kansas to determine its availability as a Non-Commercial assignment. The assignment must, as a maximum class facility, provide a first or second non-commercial service to at least 10% of the population inside the 1 mv/m or 60 dBu contour. This population must be at least 2,000 persons. The second requirement is that technical regulations must prevent the use of any reserve FM band assignment in the area.

The preclusion of reserve band channel allocation study was the first step taken for this report. A 60 dBu contour prediction study (Exhibit #1), using the allocation coordinates, determined the location of a maximum Class C3 1.0 mv/m contour. Five FM reserve band allocation studies were conducted, using the allocation site and four compass point locations one kilometer inside the 1.0 mv/m contour. The five study point locations are shown in the Exhibit #2 map. The center or allocation site study is found as part of Exhibit #1. The 0°, 90°, 180° and 270° allocation studies are attached as Exhibits #3 and #4. No reserve band channels were found that could be assigned as a full Class C3 facility. Channels with a smaller contour overlap were studied in detail. An example is Channel #215 in the Exhibit #3 Zero Degree study. This study indicated that Channel #215 only had a 20 kilometer possible short spacing. The detailed study proved that Channel #215, at the Zero Degree location, still could not be assigned as a full Class C3 facility.

The second part of the study determined that seven reserve band, non-commercial stations serve Council Grove, Kansas area. This station list is included as Exhibit #5. The Exhibit #6 map shows the location of the Council Grove 1.0 mv/m contour and its relationship to the 1.0 mv/m contours of the seven existing, or approved, non-commercial stations. An area of first non-commercial service was found including Council Grove and a large area southwest of the city. A large area of second service is located northeast of Council Grove. There are also two smaller areas of second service.

The population inside the 1.0 mv/m contour of a possible, maximum Council Grove channel 281C3 station would be 41,572 persons (2000 US Census). The population in the new first non-commercial service area would be 7,293, with an additional 2,733 persons in the three separate second non-commercial service areas. The 1st and 2nd service area populations added together is 24.1% of the total 1.0 mv/m population.

This study supports the assignment of Channel #281C3 as a non-commercial allotment for the city of Council Grove, Kansas. All information presented in this study is true and accurate to the best of my knowledge and ability.

Larry P. Waggoner
November 14, 2003

Larry Waggoner
Project: COUNCIL

EXHIBIT #1

11-11-2003

Site Coordinates: 38-39-42 North 96-29-18 West
NGDC 30-Second Database is used in Contnental US
DEM-30 Database is used in AK, HI, and PR.

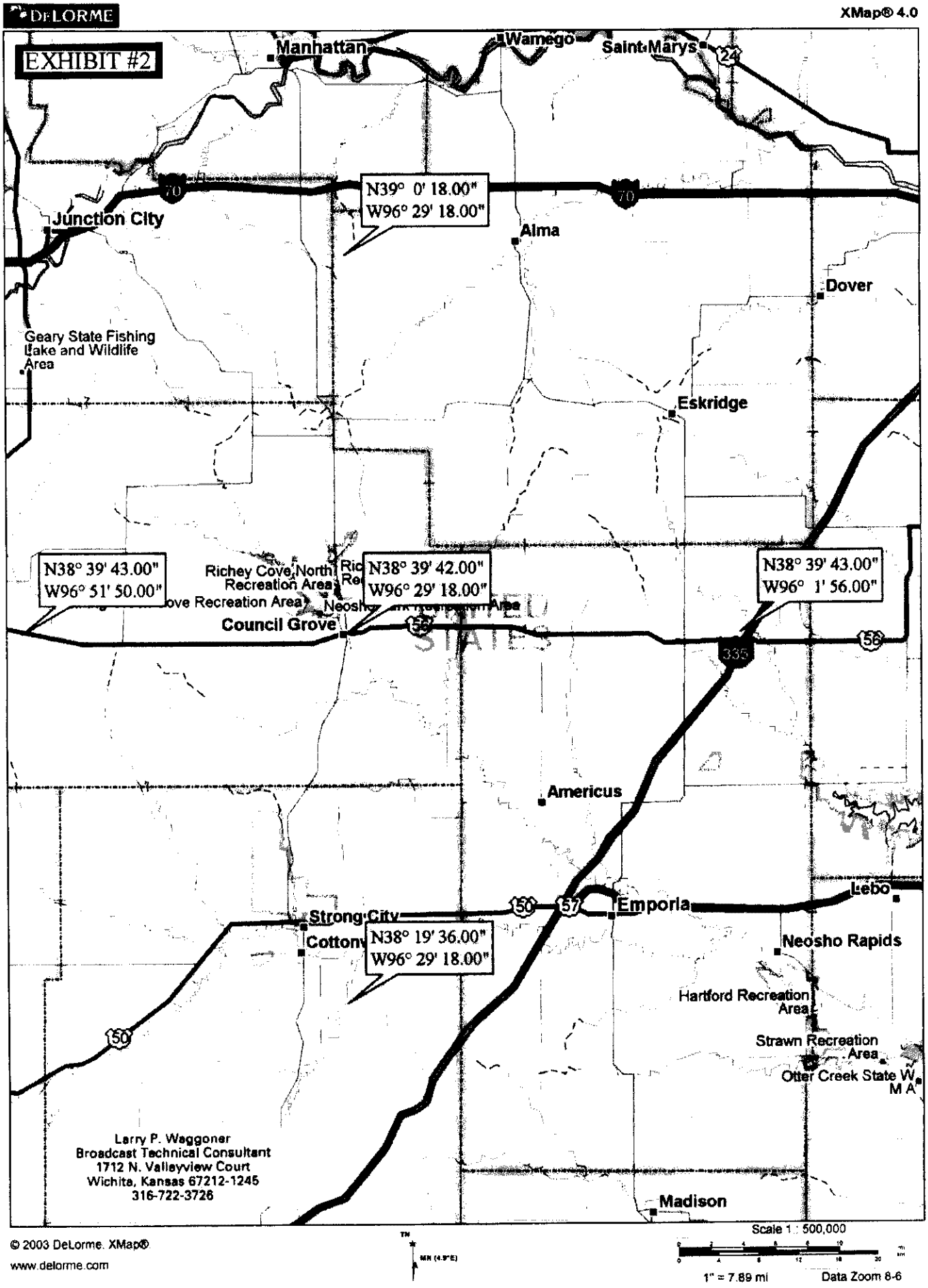
F(50,50) Contours

Azm (deg)	HAAT (mtrs)	70 dBu (km)	60 dBu (km)	Radial (mtrs)
0	101	23.2	39.1	409
45	79	20.6	34.9	431
90	111	24.3	40.7	399
135	145	27.3	45.2	365
180	96	22.7	38.2	414
225	83	21.1	35.7	427
270	73	19.8	33.7	437
315	111	24.3	40.7	399

	Data in (feet)	meters
Overall Height Above Average Terrain:	(328)	100 *
Site Elevation AMSL:	(1,240)	378
Antenna Height Above Ground Level:	(433)	132
Antenna Center Above Sea Level:	(1,673)	510
Overall Ground Average Terrain AMSL:	(1,345)	410
Effective Radiated Power:	25.00 kW *	
TV/FM Channel:	281	

FM Study for: CENTER FCC Database Date: 11/7/2003 38-39-42
Location: COUNCIL GROVE, KS Channel Class: C3 96-29-18

Chan 201	88.1	HIT COUNT:	5	MAX OVERLAP:	-118
Chan 202	88.3	HIT COUNT:	6	MAX OVERLAP:	-56
Chan 203	88.5	HIT COUNT:	4	MAX OVERLAP:	-63
Chan 204	88.7	HIT COUNT:	2	MAX OVERLAP:	-123
Chan 205	88.9	HIT COUNT:	5	MAX OVERLAP:	-63
Chan 206	89.1	HIT COUNT:	2	MAX OVERLAP:	-87
Chan 207	89.3	HIT COUNT:	4	MAX OVERLAP:	-52
Chan 208	89.5	HIT COUNT:	2	MAX OVERLAP:	-119
Chan 209	89.7	HIT COUNT:	4	MAX OVERLAP:	-96
Chan 210	89.9	HIT COUNT:	4	MAX OVERLAP:	-46
Chan 211	90.1	HIT COUNT:	4	MAX OVERLAP:	-107
Chan 212	90.3	HIT COUNT:	5	MAX OVERLAP:	-123
Chan 213	90.5	HIT COUNT:	5	MAX OVERLAP:	-83
Chan 214	90.7	HIT COUNT:	6	MAX OVERLAP:	-103
Chan 215	90.9	HIT COUNT:	3	MAX OVERLAP:	-50
Chan 216	91.1	HIT COUNT:	4	MAX OVERLAP:	-105
Chan 217	91.3	HIT COUNT:	5	MAX OVERLAP:	-89
Chan 218	91.5	HIT COUNT:	4	MAX OVERLAP:	-100
Chan 219	91.7	HIT COUNT:	5	MAX OVERLAP:	-72
Chan 220	91.9	HIT COUNT:	4	MAX OVERLAP:	-106


DeLORME
XMap® 4.0
EXHIBIT #2
Manhattan
Wamego
Saint Marys
24
70
N39° 0' 18.00"
W96° 29' 18.00"
Junction City
Alma
Dover
Geary State Fishing Lake and Wildlife Area
Eskridge
N38° 39' 43.00"
W96° 51' 50.00"
Richey Cove North Recreation Area
N38° 39' 42.00"
W96° 29' 18.00"
N38° 39' 43.00"
W96° 1' 56.00"
Council Grove
56
335
Americus
Lebo
Emporia
50
57
Strong City
Cotton
N38° 19' 36.00"
W96° 29' 18.00"
Neosho Rapids
Hartford Recreation Area
Strawn Recreation Area
Otter Creek State W M A
Larry P. Waggoner
Broadcast Technical Consultant
1712 N. Valleyview Court
Wichita, Kansas 67212-1245
316-722-3726
Madison
Scale 1 : 500,000
1" = 7.89 mi
Data Zoom 8-6
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www.delorme.com

11-12-2003 Larry Waggoner **EXHIBIT #3**

FM Study for: ZERO FCC Database Date: 11/7/2003 39-00-18
Location: COUNCIL GROVE, KS Channel Class: C3 96-29-18

Chan 201	88.1	HIT COUNT:	8	MAX OVERLAP:	-136
Chan 202	88.3	HIT COUNT:	11	MAX OVERLAP:	-69
Chan 203	88.5	HIT COUNT:	8	MAX OVERLAP:	-101
Chan 204	88.7	HIT COUNT:	7	MAX OVERLAP:	-161
Chan 205	88.9	HIT COUNT:	10	MAX OVERLAP:	-101
Chan 206	89.1	HIT COUNT:	10	MAX OVERLAP:	-55
Chan 207	89.3	HIT COUNT:	8	MAX OVERLAP:	-65
Chan 208	89.5	HIT COUNT:	5	MAX OVERLAP:	-132
Chan 209	89.7	HIT COUNT:	7	MAX OVERLAP:	-65
Chan 210	89.9	HIT COUNT:	10	MAX OVERLAP:	-23
Chan 211	90.1	HIT COUNT:	8	MAX OVERLAP:	-84
Chan 212	90.3	HIT COUNT:	8	MAX OVERLAP:	-139
Chan 213	90.5	HIT COUNT:	7	MAX OVERLAP:	-96
Chan 214	90.7	HIT COUNT:	9	MAX OVERLAP:	-73
Chan 215	90.9	HIT COUNT:	12	MAX OVERLAP:	-20
Chan 216	91.1	HIT COUNT:	11	MAX OVERLAP:	-77
Chan 217	91.3	HIT COUNT:	7	MAX OVERLAP:	-106
Chan 218	91.5	HIT COUNT:	6	MAX OVERLAP:	-105
Chan 219	91.7	HIT COUNT:	8	MAX OVERLAP:	-71
Chan 220	91.9	HIT COUNT:	14	MAX OVERLAP:	-124

FM Study for: 90 FCC Database Date: 11/7/2003 38-39-43
Location: COUNCIL GROVE, KS Channel Class: C3 96-01-56

Chan 201	88.1	HIT COUNT:	7	MAX OVERLAP:	-144
Chan 202	88.3	HIT COUNT:	10	MAX OVERLAP:	-87
Chan 203	88.5	HIT COUNT:	12	MAX OVERLAP:	-69
Chan 204	88.7	HIT COUNT:	8	MAX OVERLAP:	-109
Chan 205	88.9	HIT COUNT:	7	MAX OVERLAP:	-75
Chan 206	89.1	HIT COUNT:	13	MAX OVERLAP:	-61
Chan 207	89.3	HIT COUNT:	8	MAX OVERLAP:	-68
Chan 208	89.5	HIT COUNT:	6	MAX OVERLAP:	-84
Chan 209	89.7	HIT COUNT:	7	MAX OVERLAP:	-108
Chan 210	89.9	HIT COUNT:	7	MAX OVERLAP:	-55
Chan 211	90.1	HIT COUNT:	9	MAX OVERLAP:	-79
Chan 212	90.3	HIT COUNT:	10	MAX OVERLAP:	-139
Chan 213	90.5	HIT COUNT:	7	MAX OVERLAP:	-79
Chan 214	90.7	HIT COUNT:	8	MAX OVERLAP:	-117
Chan 215	90.9	HIT COUNT:	11	MAX OVERLAP:	-64
Chan 216	91.1	HIT COUNT:	12	MAX OVERLAP:	-73
Chan 217	91.3	HIT COUNT:	10	MAX OVERLAP:	-70
Chan 218	91.5	HIT COUNT:	6	MAX OVERLAP:	-137
Chan 219	91.7	HIT COUNT:	5	MAX OVERLAP:	-70
Chan 220	91.9	HIT COUNT:	11	MAX OVERLAP:	-109

11-12-2003 Larry Waggoner **EXHIBIT #4**

FM Study for: 180 FCC Database Date: 11/7/2003 38-19-36
Location: COUNCIL GROVE, KS Channel Class: C3 96-29-18

Chan 201	88.1	HIT COUNT:	7	MAX OVERLAP:	-91
Chan 202	88.3	HIT COUNT:	13	MAX OVERLAP:	-72
Chan 203	88.5	HIT COUNT:	13	MAX OVERLAP:	-32
Chan 204	88.7	HIT COUNT:	12	MAX OVERLAP:	-86
Chan 205	88.9	HIT COUNT:	6	MAX OVERLAP:	-48
Chan 206	89.1	HIT COUNT:	10	MAX OVERLAP:	-115
Chan 207	89.3	HIT COUNT:	5	MAX OVERLAP:	-48
Chan 208	89.5	HIT COUNT:	5	MAX OVERLAP:	-95
Chan 209	89.7	HIT COUNT:	9	MAX OVERLAP:	-109
Chan 210	89.9	HIT COUNT:	5	MAX OVERLAP:	-60
Chan 211	90.1	HIT COUNT:	6	MAX OVERLAP:	-121
Chan 212	90.3	HIT COUNT:	7	MAX OVERLAP:	-93
Chan 213	90.5	HIT COUNT:	10	MAX OVERLAP:	-59
Chan 214	90.7	HIT COUNT:	10	MAX OVERLAP:	-108
Chan 215	90.9	HIT COUNT:	8	MAX OVERLAP:	-58
Chan 216	91.1	HIT COUNT:	9	MAX OVERLAP:	-125
Chan 217	91.3	HIT COUNT:	7	MAX OVERLAP:	-58
Chan 218	91.5	HIT COUNT:	6	MAX OVERLAP:	-84
Chan 219	91.7	HIT COUNT:	11	MAX OVERLAP:	-65
Chan 220	91.9	HIT COUNT:	6	MAX OVERLAP:	-117

FM Study for: 270 FCC Database Date: 11/7/2003 38-39-43
Location: COUNCIL GROVE, KS Channel Class: C3 96-51-50

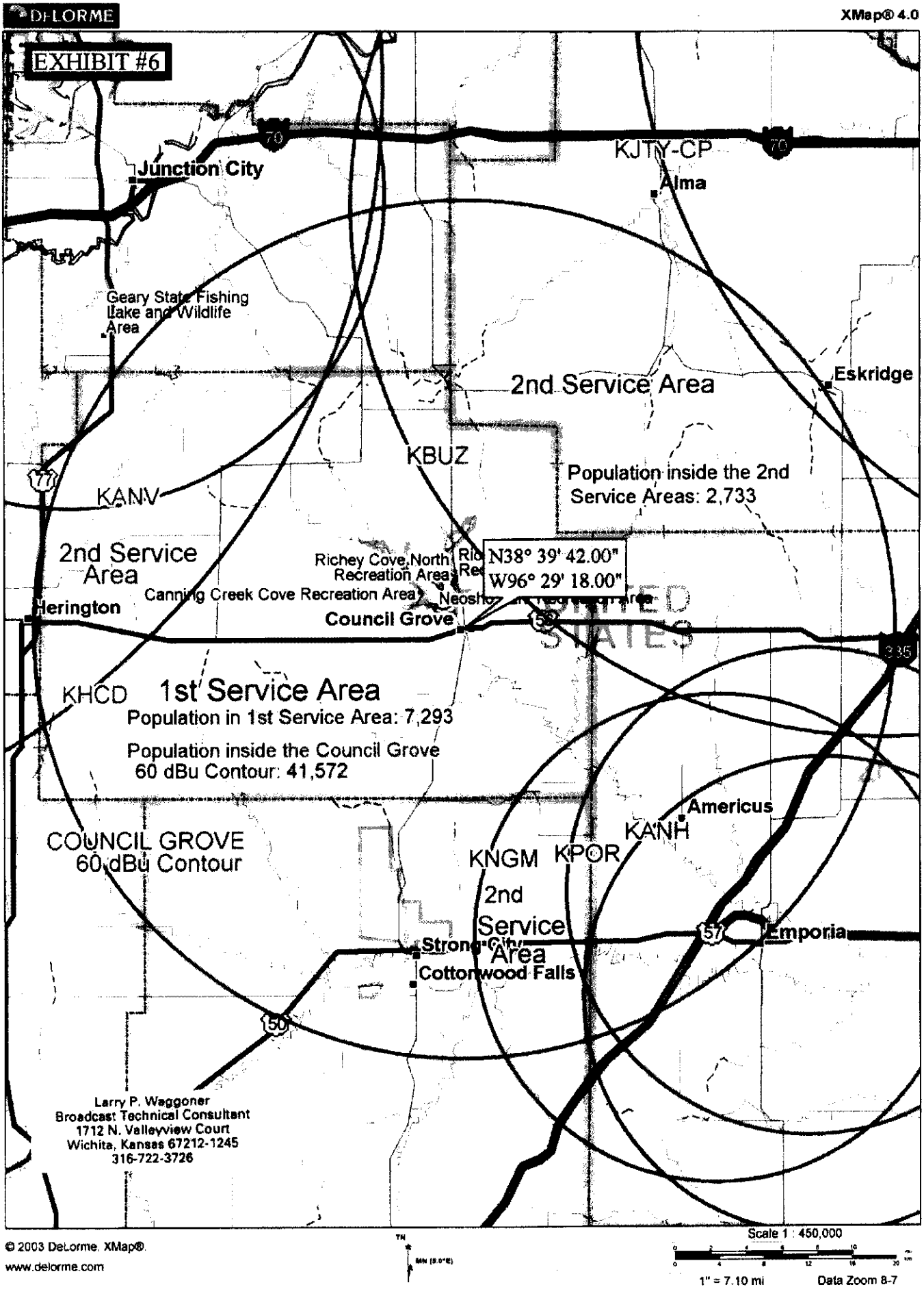
Chan 201	88.1	HIT COUNT:	9	MAX OVERLAP:	-91
Chan 202	88.3	HIT COUNT:	11	MAX OVERLAP:	-36
Chan 203	88.5	HIT COUNT:	12	MAX OVERLAP:	-80
Chan 204	88.7	HIT COUNT:	6	MAX OVERLAP:	-116
Chan 205	88.9	HIT COUNT:	7	MAX OVERLAP:	-56
Chan 206	89.1	HIT COUNT:	12	MAX OVERLAP:	-103
Chan 207	89.3	HIT COUNT:	7	MAX OVERLAP:	-77
Chan 208	89.5	HIT COUNT:	4	MAX OVERLAP:	-144
Chan 209	89.7	HIT COUNT:	10	MAX OVERLAP:	-77
Chan 210	89.9	HIT COUNT:	7	MAX OVERLAP:	-73
Chan 211	90.1	HIT COUNT:	8	MAX OVERLAP:	-134
Chan 212	90.3	HIT COUNT:	6	MAX OVERLAP:	-97
Chan 213	90.5	HIT COUNT:	8	MAX OVERLAP:	-109
Chan 214	90.7	HIT COUNT:	10	MAX OVERLAP:	-74
Chan 215	90.9	HIT COUNT:	8	MAX OVERLAP:	-59
Chan 216	91.1	HIT COUNT:	12	MAX OVERLAP:	-126
Chan 217	91.3	HIT COUNT:	7	MAX OVERLAP:	-103
Chan 218	91.5	HIT COUNT:	7	MAX OVERLAP:	-69
Chan 219	91.7	HIT COUNT:	10	MAX OVERLAP:	-105
Chan 220	91.9	HIT COUNT:	9	MAX OVERLAP:	-80

11-12-2003 Larry Waggoner

FCC Database Date: 11/7/2003

EXHIBIT #5

# CALL STATUS	LOCATION STATE	CHANNEL POWER CLASS	LATITUDE LONGITUDE	DISTANCE BEARING	COUNCIL 100 mV/m
COUNCIL PRO	COUNCIL GROVE KS	281 25.0 kW Class C3	38-39-42 96-29-18	Source Station	
1 KJTY CP	TOPEKA KS BPED-910408IG	201 100.0 kW Class C1	39-11-25 95-39-29	93 km 36 km 51 dg 58 km	+4 km
2 KHCD LIC	SALINA KS BLED-880229KF	208 100.0 kW Class C1	39-06-16 97-23-15	92 km 39 km 302 dg 72 km	+18 km
3 KANH LIC	EMPORIA KS BLED-020502AAC	209 3.0 kW Class A	38-21-45 96-07-00	46 km 45 km 136 dg 22 km	+14 km
4 KBUZ LIC	TOPEKA KS BLED-930927KB	212 11.0 kW Class C2	39-00-19 96-02-58	54 km 35 km 45 dg 43 km	+28 km
5 KPOR LIC	EMPORIA KS BLED-000717AAT	214 2.0 kW Class A	38-26-50 96-07-42	39 km 44 km 127 dg 12 km	WITHIN
6 KANV LIC	OLSBURG KS BLED-030117ABS	217 6.0 kW Class A	39-00-55 96-53-55	53 km 40 km 318 dg 28 km	+14 km
7 KNGM LIC	EMPORIA KS BLED-870127KA	220 3.0 kW Class A	38-24-35 96-13-30	36 km 45 km 141 dg 47 km	WITHIN


DeLORME
XMap® 4.0
EXHIBIT #6
Junction City
KJTY-CP
Alma
Geary State Fishing Lake and Wildlife Area
2nd Service Area
Eskridge
KBUZ
Population inside the 2nd Service Areas: 2,733
KANV
2nd Service Area
Richey Cove North Recreation Area
Canning Creek Cove Recreation Area
N38° 39' 42.00"
W96° 29' 18.00"
Herington
Council Grove
KHCD
1st Service Area
Population in 1st Service Area: 7,293
Population inside the Council Grove 60 dBu Contour: 41,572
Americus
KANH
COUNCIL GROVE 60 dBu Contour
KNGM
KPOR
2nd Service Area
Emporia
Strong City
Cottonwood Falls
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Scale 1 : 450,000
1" = 7.10 mi
Data Zoom 8-7